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February 6, 2020

ECF

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)  
*Ashton et al. v. al Qaeda et al.*, 02-cv-6977 (GBD) (SN)

Dear Judge Daniels:

We represent certain of the plaintiffs in the above-referenced action and are in the process of preparing amended exhibits indicating the name of the plaintiff estate representatives of the estates of victims killed on September 11, 2001 in the terrorist attacks (all of which have been included in prior complaints filed in the above dockets), not only the names of those victims. ECF No. 5862. In doing so, and in confirming that each plaintiff appears on a filed complaint consolidated with this multi-district litigation, we have identified a few instances in which the named plaintiff has recently changed or had a minor error in the original complaint and a single case in which the decedent was listed on the original complaint as the plaintiff and the estate representative was listed as the decedent. All plaintiffs below are included in complaints filed in the civil docket case number 02-cv-6977 (S.D.N.Y.) (GBD)(SN).

In anticipation of filing amended exhibits tomorrow that will reflect the correct information in those cases, we respectfully request that this Court, pursuant to Fed.R.Civ.P. 15 and 25(a), make the following substitutions and corrections. Filed with this letter-request are letters formally appointing the new representative of the estate previously named as well as documentation demonstrating the correct name (where a correction is necessary).

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<b>Type of Correction / Substitution</b>	<b>Former Plaintiff Name</b>	<b>Proposed New Plaintiff Name</b>	<b>Supporting Exhibit</b>
Switch Names of Personal Representative and Decedent	Edelmiro Abad as Personal Representative of the Estate of Lorraine Abad, Deceased and on behalf of all survivors of Lorraine Abad	Lorraine Abad as Personal Representative of the Estate of Edelmiro Abad, Deceased and on behalf of all survivors of Edelmiro Abad	Exhibit A
Substitute Personal Representative	Emmet P. Kelly as Administrator of the Estate of Thomas Richard Kelly, Deceased and on behalf of all survivors of Thomas Richard Kelly	James P. Kelly as Administrator of the Estate of Thomas Richard Kelly, Deceased and on behalf of all survivors of Thomas Richard Kelly	Exhibit B
Substitute Personal Representative	Ilia Rodriguez as Personal Representative of the Estate of Carlos R. Lillo, Deceased and on behalf of all survivors of Carlos R. Lillo	Haydee Cecilia Lillo as Personal Representative of the Estate of Carlos R. Lillo, Deceased and on behalf of all survivors of Carlos R. Lillo	Exhibit C
Correction (personal representative suffix and decedent suffix)	George McLaughlin, as Personal Representative of the Estate of George McLaughlin III, Deceased and on behalf of all survivors of George McLaughlin III	George McLaughlin, Sr., as Personal Representative of the Estate of George McLaughlin Jr., Deceased and on behalf of all survivors of George McLaughlin Jr.	Exhibit D
Correction (decedent middle initial)	Olga Merino, as Personal Representative of the Estate of George C. Merino, Deceased and on behalf of all survivors of George C. Merino	Olga Merino, as Personal Representative of the Estate of George L. Merino, Deceased and on behalf of all survivors of George C. Merino	Exhibit E

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Substitute Personal Representative	Helene S. Passaro, as Administrator of the Estate of Suzanne H. Passaro, Deceased and on behalf of all survivors of Suzanne H. Passaro	Irene Dubin, as Administrator ad Prosequendum of the Estate of Suzanne Helen Passaro, Deceased and on behalf of all survivors of Suzanne H. Passaro	Exhibit F
Correction (misspelled first name of personal representative)	Joseph Perrotta, as Personal Representative of the Estate of Edward Joseph Perrotta, Deceased and on behalf of all survivors of Edward Joseph Perrotta	Josephine Perrotta, as Personal Representative of the Estate of Edward Joseph Perrotta, Deceased and on behalf of all survivors of Edward Joseph Perrotta	Exhibit G
Correction (misspelled first name of personal representative)	Benjamin Shamay, as Administrator of the Estate of Gary Shamay, Deceased and on behalf of all survivors of Gary Shamay	Beniamin Shamay, as Administrator of the Estate of Gary Shamay, Deceased and on behalf of all survivors of Gary Shamay	Exhibit H

In view of the anticipated deadlines, we respectfully ask the Court to so-order this request as soon as possible. Amended exhibits will be filed as soon as possible tomorrow.

We also note that with respect to separating out those decedents represented by a *Betru* plaintiff, we had done so previously, and all *Betru* plaintiffs and decedents appeared on Exhibits B-1 and B-2 to our original moving papers. We will not file amended versions of those, only Exhibits A-1 and A-2.

We thank the Court for its consideration of this request.

Respectfully,

Kreindler & Kreindler LLP

By: /s/ Megan W. Benett

Enclosure